BPA TC-25 Tariff proceeding Queue Reform Comments – Clearway Energy Group

Clearway Energy Group ("Clearway") appreciates the opportunity to provide comments on the Bonneville Power Administration's ("BPA") queue reform effort. Clearway appreciates that BPA is proactively taking steps to improve the efficiency of the interconnection queue process to support decarbonization goals and better serve its customers.

Clearway supports the overall initiative with specific comments on the following aspects of the proposal:

1. FR/FS Two-Phase Cluster Study Approach:
   Clearway supports this approach.
2. Study Deposits:
   The study deposit is supposed to cover study activity costs. MW size of the project has little correlation to the study work. A 50 MW and a 500 MW generator request will require BPA to do the same amount of study work.
   We recommend $150k or $250k (or bigger) deposit, like CAISO, to enter the queue at once. A one-time sizeable deposit would give a better certainty of projected expenses during study process.

3. Site Control
   Oppose removing the in lieu of deposit. Too stringent and unfair to expect projects to lock-in the land without knowing interconnection outcomes. Consider an in-lieu deposit to enter the queue and site control requirement at the receipt of the Facility Study.

4. Study Costs:
   Clearway supports allocating 100% of the cluster study costs by the number of customers participating in the cluster study. MW size of the project should not be used to determine study cost as it has little correlation to the study work and therefore cost responsibility.

5. Commercial Readiness:
   The option towards which BPA is leaning (Alternative 2) limits commercial readiness demonstration to multiple/s of study deposit amount and does not allow a procurement shortlist or a PPA as an option.
   BPA should consider the multiple of deposits in lieu of a well-defined set of commercial readiness criteria (and other allowable commercial readiness mentioned for Transition Cluster).

6. Network Upgrade Costs:
   a. Station equipment Network Upgrades: Should be allocated equally based on the number of Generating Facilities interconnecting at an individual station.
   b. Transmission and distribution Network Upgrade:
      i. Thermal - BPA should define a cut-off for allocating cost. e.g. only those generators with a DFAX of more than x% AND a flow impact of more than y% of the rating of the limiting facility will be allocated NU cost.
      ii. Voltage and Stability – Interconnection Customer's share of the proportional capacity of each individual Generating Facility in the Cluster.
      iii. Short circuit – Based on short circuit contribution of each individual project

7. Transition Process:

a. Agree that advanced stage projects (with signed FS agreement) should be allowed an option to continue with Transitional Serial process.
b. Downsizing Opportunity: All the projects not meeting advanced stage (before FS agreement) will be part of transition cluster. However, per BPA staff's leaning, these would need to demonstrate site control. Therefore, BPA should allow downsizing opportunity at the start of the transition cluster, so customer have an option to show site control for reduced MW and still be part of transitional cluster.
c. Commercial Readiness Requirements to stay in the transition cluster are more stringent than the requirements to enter the permanent cluster study. This puts unreasonable burden on customers that have entered the queue and are experiencing delays.
   Commercial Readiness Requirements for transition cluster should be similar to that of subsequent cluster studies.

8. General comments:
   a. In case where multiple projects are connecting to the same transmission line as a Point of Interconnection (POI), BPA should clarify the exact location on the transmission line that will be considered as the POI. Clearway recommends that this information is disclosed during the Customer Engagement window and not at the end of Phase 1 cluster study.